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November 30, 2020

## VIA ECF

The Honorable Ronnie Abrams  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

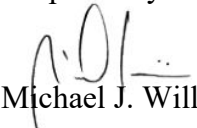
Re: Eckhart v. Fox News Network, LLC, et al.; Civ. Case No. 1:20-cv-5593 (RA)

Dear Judge Abrams:

We represent Plaintiff Jennifer Eckhart in the above-referenced matter, and we write to respectfully request the Court's permission for an extension of time to file Plaintiff's opposition to the motion to dismiss filed by Defendant Fox News Network, LLC ("Fox") on November 24, 2020 (the "Fox Motion"). Specifically, Plaintiff requests that she be allowed to file her opposition to the Fox Motion on January 6, 2021, rather than on December 8, 2020. The additional time is necessary to allow Wigdor LLP to respond to all of the arguments and contentions contained in the Fox Motion, especially in light of pressing deadlines in other cases and the holidays. We have conferred with Fox, and, while it does not consent to Plaintiff's application because it desires "a prompt decision on the motions pending before the Court," it also does not oppose to Plaintiff's request for an extension of time to file her opposition papers. Importantly, Defendant Ed Henry had previously sought and received the Court's permission for an extension of time for his motion to dismiss until December 7, 2020 (the "Henry Motion"). *See* Dkt. No. 116. In that same application, Your Honor allowed Plaintiff to file her opposition to the Henry Motion on January 6, 2021. *Id.* Granting Plaintiff's request now would therefore align her opposition dates for the Henry Motion and the Fox Motion, which would ensure that any delay occasioned by Plaintiff's extension request is *de minimus*. In the event that Plaintiff's extension request is granted, Fox requests that its reply papers be submitted by January 25, 2021.

We thank Your Honor for the Court's consideration and attention to this matter.

Respectfully submitted,



Michael J. Willemin